

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

NICOLE P. ERAMO,)
)
Plaintiff,)
)
v.)
)
ROLLING STONE LLC,) Case No. 3:15-mc-00011-GEC
SABRINA RUBIN ERDELY, and)
WENNER MEDIA LLC,)
)
Defendants.)

MOTION FOR ADMISSION OF COUNSEL *PRO HAC VICE*

COMES NOW Michael J. Finney (VSB #78484), admitted to practice before this Court and pursuant to Rule 6(d) of the General Local Rules, moves this Court for the *pro hac vice* admission of Elizabeth A. McNamara to practice in the above-referenced proceeding as co-counsel for Defendants Rolling Stone LLC, Sabrina Rubin Erdely, and Wenner Media LLC.

In support of this motion, the movant states as follows:

1. Ms. McNamara practices with the law firm of Davis Wright Tremaine LLP. Her contact information is as follows:

Davis Wright Tremaine LLP
1251 Avenue of the Americas, 21st Floor
New York, New York 10020
Telephone: (212) 603-6437
Fax: (212) 489-8340
E-mail: lizmcnamara@dwt.com

2. Ms. McNamara received her J.D. from the University of North Carolina School of Law in 1981.

3. Ms. McNamara was admitted to the New York State Bar in 1982. Her New York State Bar number is 1930643.

4. Ms. McNamara is admitted to practice law in all New York state courts. In addition, she is admitted to the bars of the United States Supreme Court, the United States Court of Appeals for the First Circuit, the United States Court of Appeals for the Second Circuit, the United States Court of Appeals for the Third Circuit, the United States Court of Appeals for the Ninth Circuit, the Eastern District of New York, the Southern District of New York, and the Eastern District of Michigan.

5. The above proceeding involves Plaintiff's motion to compel third-party "Jackie" to comply with a Rule 45 subpoena in Case No. 3:15-cv-00023-GEC, currently pending in this Court. The Court admitted Ms. McNamara *pro hac vice* in Case No. 3:15-cv-00023-GEC on June 11, 2015 (Dkt. No. 16).

6. The undersigned attorney and law firm will continue to represent Defendants until a final determination has been reached in this proceeding.

7. Ms. McNamara has agreed to abide by the rules of this Court and submit to this Court's disciplinary rules and procedures.

8. Ms. McNamara has never been disbarred, suspended, or denied admission to practice law in any jurisdiction.

9. A proposed Order is attached to this Motion and will also be emailed to the Court
WHEREFORE, Movant Michael J. Finney respectfully requests that this Court admit Elizabeth A. McNamara to practice in the above referenced matter *pro hac vice*.

Respectfully submitted,

/s/ Michael J. Finney

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Elizabeth A. McNamara (*pro hac vice* application pending)
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Attorneys for Defendants Rolling Stone LLC, Sabrina Rubin Erdely, and Wenner Media LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of December, 2015, a true and correct copy of the foregoing was filed with the Clerk of Court using the CM/ECF system, which provided electronic service to all counsel of record.

/s/ Michael J. Finney